

REMARKS

Claims 14-26 are pending in the application. Claims 14-16, 19, 21-23, and 26 have been amended by the present amendment to eliminate reference symbols. Independent claims 14 and 22 also have been amended to recite a memory device having a storage capacity of **greater than one insertion picture but less than two insertion pictures**. The amendments are fully supported by the application as originally filed (see, e.g., specification at page 3, lines 10-18).

For example, referring to FIGS. 2a to 2c of the Applicants' invention, the memory device has a storage capacity of 1.5 fields and is subdivided into three memory segments X, Y, and Z, where all three segments have the same size and are **continuously overwritten**. According to the Applicants' claimed invention, more than one memory segment (X, Y, and Z) is required for storing an insertion picture, and the total storage capacity of the memory device is **greater than one insertion picture but less than two insertion pictures**. As a result, Applicants' claimed invention enables memory segments of the memory device to be continuously overwritten, while still preventing the read pointer from overtaking the write pointer during picture-in-picture insertion (see specification at page 2, lines 2-15).

Claims 14-26 were rejected under 35 USC 102(b) as being anticipated by U.S. Patent 5,369,442 to Braun.

Braun does not teach or suggest a method or circuit arrangement for picture-in-picture insertion, including a memory device with a storage capacity of **greater than one insertion picture but less than two insertion pictures**. Braun also does not teach or suggest a method or circuit arrangement in which memory segments of the memory device are **continuously overwritten**.

In the Office Action, the Examiner alleged that "a sequence of insertion pictures [as recited in claims 14 and 22] ... is met by the insertion pictures K1 and K2 inserted by the inserting device ES into a sequence of main signals H1 and H2" (see Office Action, page 2 *last*

line to page 3 first line). However, on page 3, item (b) of the Office Action, the Examiner then refers to "successive half-frames" K1, K2 of the small picture K.

Assuming that the small picture K in Braun is considered an insertion picture, where successive half-frames K1, K2 of the small picture K are stored in memory regions SP1, SP2, then the memory device SP in Braun would have the storage capacity of two half-frames, or one insertion picture.

As amended, claims 14 and 22 require the memory device to have a storage capacity of **greater than one insertion picture but less than two insertion pictures**, which enables memory segments of the memory device to be **continuously overwritten**.

However, Braun merely teaches the memory device SP having a storage capacity of two half-frames K1, K2, which equals one insertion picture K. Moreover, these half-frames K1, K2 are not continuously overwritten; instead, both half-frames K1, K2 must be furnished to produce an insertion picture.

It is believed that the claims are in condition for immediate allowance, which action is earnestly solicited.

Respectfully submitted,

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